

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mercury Public Affairs LLC,

Plaintiff,

v.

Civil Action, File No. 19-7518 (VSB)

Airbus Defence and Space, S.A.U., f/k/a Airbus Military,
Defendant.

**AFFIDAVIT IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

Morris L. Reid, being duly sworn, deposes and says:

1. That I am a Partner with Plaintiff Mercury Public Affairs, LLC ("Mercury") and was the partner in charge of the providing the consulting services to Defendant Airbus Defence and Space, S.A.U., f/k/a Airbus Military's ("ADSS"). As such, I am familiar with the facts and circumstances in this case. I make this affidavit in support of Mercury's opposition to ADSS's motion to dismiss the complaint.

2. Mercury's attorneys have shown me a copy of the Memorandum of Law in support of ADSS's motion to dismiss the complaint which argues, among other things, that the Court lacks personal jurisdiction over ADSS. ADSS reasons that meetings which took place in the United Nations headquarters in New York City do not invoke "the benefits and protections of New York law" because the U.N. is not an ordinary part of the State of New York and has special status under international law.

3. While, as described in the amended complaint, I personally attended meetings with ADSS employees within the U.N. headquarters, I also participated in meetings with ADSS employees in New York City but outside of the U.N. headquarters to recap those U.N. meetings. To that end, I had several meetings with ADSS employees in 2013 and 2014 at the W Hotel on Lexington Avenue in New York City. Present from ADSS during one or more of those meetings was Gonzalo Rodriguez and Antonio Rodriguez-Barberan.

4. The topic of the discussions referenced above and in the amended complaint that took place during the meetings both in the U.N. as well as in the W Hotel was the sale of ADSS's military aircrafts. My participation in those discussions was in furtherance of Mercury's efforts to aid ADSS's military aircraft sales campaign which formed the basis of the parties April 2013 Agreement.

WHEREFORE, your deponent respectfully requests that the Court deny ADSS's motion to dismiss the amended complaint and for such other and further relief as to the Court may seem just and proper.


Morris L. Reid

Sworn to before me this
29th day of January 2020


Notary Public

Dominic Anderson
District of Columbia, Notary Public
My Commission Expires
September 30, 2021

